

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : **Chapter 11**
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MOTORS LIQUIDATION COMPANY, et al., : **Case No.: 09-50026 (MG)**
:
f/k/a General Motors Corp., et al. : **(Jointly Administered)**
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Debtors. :
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**STIPULATION AND AGREED ORDER REGARDING BRIEFING
SCHEDULE FOR MOTION BY GENERAL MOTORS LLC TO ENFORCE
THE BANKRUPTCY COURT’S JULY 5, 2009 SALE ORDER AND
INJUNCTION AND THE RULINGS IN CONNECTION THEREWITH,
WITH RESPECT TO ROBERT RANDALL BUCHANAN**

General Motors LLC (“**New GM**”) and Robert Randall Buchanan (“**Buchanan**” and, together with New GM, the “**Parties**”), by and through their undersigned counsel, enter into this Stipulation and Agreed Order and state:

WHEREAS, on May 3, 2016, Buchanan commenced a lawsuit (“**Buchanan Lawsuit**”) against New GM captioned *Robert Randall Buchanan, Individually and as Administrator of the Estate of Glenda Marie Buchanan v. General Motors LLC, et al.*, that is pending in the State Court of Cobb County, Georgia, Civil Action No.: 16-A-1280-7; and

WHEREAS, on February 4, 2020 and in connection with the Buchanan Lawsuit, New GM filed in this Court the *Motion By General Motors LLC To Enforce The Bankruptcy Court’s July 5, 2009 Sale Order And Injunction And The Rulings In Connection Therewith, With Respect To Robert Randall Buchanan* [ECF No. 14667] (“**Buchanan Motion to Enforce**”); and

WHEREAS, the Parties have met and conferred regarding the briefing of the Buchanan Motion to Enforce and have agreed on the schedule set forth herein.

NOW, THEREFORE, it is hereby stipulated and agreed by and between the Parties, through their undersigned counsel, as follows:

1. Buchanan shall file any objection or response to the Buchanan Motion to Enforce on or before March 12, 2020.

2. New GM shall file any reply with respect to the Buchanan Motion to Enforce on or before March 23, 2020.

3. A hearing on the Buchanan Motion to Enforce will be held before the Honorable Martin Glenn, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on March 26, 2020 at 2:00 p.m.

4. By entering into this Stipulation and Agreed Order, neither Party shall be deemed to have waived any claim, argument or defense that it has made or may make in connection with the Buchanan Motion to Enforce and/or the Buchanan Lawsuit, and all such claims, arguments and defenses are expressly preserved.

5. This Stipulation and Agreed Order may be executed in one or more counterparts, each of which is deemed an original, together constituting one and the same document. Facsimile signatures or signatures received via e-mail transmission are treated as a binding and original document, and the facsimile signature or e-mail signature of any party is considered an original signature.

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<p><u>/s/ Scott Davidson</u> Arthur Steinberg Scott Davidson KING & SPALDING LLP 1185 Avenue of the Americas New York, NY 10036 (212) 556-2100 (212) 556-2222 (Facsimile) <i>Counsel to General Motors LLC</i></p>	<p><u>/s/ Mark Tsukerman</u> Mark Tsukerman COLE SCHOTZ P.C. 1325 Avenue of the Americas New York, New York 10019 (212) 752-8000 (646) 563-7948 (Facsimile) <i>Counsel to Robert Randall Buchanan</i></p>
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IT IS SO ORDERED.

Dated: February 21, 2020
New York, New York

/s/ Martin Glenn
MARTIN GLENN
United States Bankruptcy Judge